



May 10, 2005

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Office of Nutritional Products
Labeling and Dietary Supplements (HFS-810)
Center for Food Safety and Applied Nutrition
U.S. Food and Drug Administration
5100 Paint Branch Parkway
College Park, MD 20740

Pursuant to the requirements of Section 6 of the Dietary Supplement Health and Education Act of 1994, 21 U.S.C. 343 r (6) and in accordance with the authorized provisions of 21CFR 101.93, Advocare provides notification for statements on dietary supplement labels as follows:

The name and address of the manufacturer, packer or distributor of the dietary supplement that bears the statements:

AdvoCare International, L.P.
2727 Realty Road
Carrollton, TX 75006

Product Name: SPARK Energy drink, (Fruit Punch)

Statement

Basis for Statement

Provides support for long lasting energy

L-Carnitine (as tartrate) L-Tyrosine
Caffeine Taurine
Thiamine Riboflavin
Choline
Chromium (as chromium citrate)
Coenzyme Q-10
Niacin (as niacinamide and niacin)
Vitamin B-6 (as pyridoxine HCl)
Vitamin B-12 (as cyanocobalamin)

Supports mental energy and focus

L-Carnitine (as tartrate) L-Tyrosine
Caffeine Taurine
Thiamine Riboflavin
Choline
Chromium (as chromium citrate)
Coenzyme Q-10 Glycine
Choline (as citrate and bitartrate)
Vitamin B-6 (as pyridoxine HCl)
Vitamin B-12 (as cyanocobalamin)
Gamma-aminobutyric acid (GABA)

Has antioxidant activity

Vitamin A (as vitamin A palmitate)
Vitamin C (as ascorbic acid)
Vitamin E (as d-alpha tocopheryl acetate)
Coenzyme Q-10
Zinc (as zinc monomethionine)

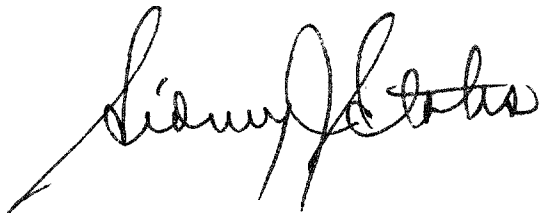
Helps fight occasional drowsiness

L-Carnitine (as tartrate)	L-Tyrosine
Caffeine	Taurine
Thiamine	Riboflavin
Choline	
Chromium (as chromium citrate)	
Coenzyme Q-10	
Niacin (as niacinamide and niacin)	
Vitamin B-6 (as pyridoxine HCl)	
Vitamin B-12 (as cyanocobalamin)	

Certification

The undersigned certifies that the information contained in this notice is complete and accurate and that Advocare International, L.P. has substantiation that the statements are truthful and not misleading.

Respectfully yours,

A handwritten signature in black ink, appearing to read "Sidney Stohs". The signature is fluid and cursive, with a long horizontal stroke at the beginning and a large, looped "S" at the end.

Sidney Stohs, Ph.D.
Senior Vice President, Research and Development
AdvoCare International, L.P.